

## REMARKS

Claims 1, 5 and 37 are amended. No new matter was added. Support for the amendment to claim 1 may be found in at least paragraphs 0012, 0017, 0018, 0022, 0023 and 0026 of the application. Support for the amendments to claims 5 and 37 may be found in at least paragraphs 0022 and 0023 of the application.

### Claims 1-9, 11-13, and 31-34 are Allowable

The Office has rejected claim 1, at paragraph 4 of the Office Action, under 35 U.S.C. § 103(a), as being unpatentable over U.S. Application No. 2004/0141596 ("*Crockett*"), and further in view of U.S. Patent No. 6,587,822 ("*Brown*"). Applicant(s) respectfully traverse the rejections.

None of the cited references, including *Crockett* and *Brown*, disclose or suggest the specific combination of claim 1. For example, *Crockett* does not disclose a system to "create the enterprise voice directory based on the encrypted XML-based files, the enterprise voice directory configured for run-time access by the voice activated auto-attendant service provider network", as recited in claim 1. The Office states that *Crockett* discloses this feature in paragraphs 0123, 0124, and 0150. However, the cited portions of *Crockett* disclose a voice response system for a subscriber to enable and disable AIN features. "For example, the VXML platform 40 may play the following menu: "Please say 'one' to turn your call forwarding ON; 'two' to activate your weekly schedule; 'three' to activate your priority screening list; or 'four' to amend your call forwarding options". *Crockett* paragraph 0150. Enabling and disabling AIN features using a voice response system does not teach or suggest creating an enterprise voice directory accessible by a voice-activated auto-attendant. Moreover, neither the cited portion, nor any other portion of *Crockett*, discloses a system to "create the enterprise voice directory based on the encrypted XML-based files, the enterprise voice directory configured for run-time access by the voice activated auto-attendant service provider network", as recited in claim 1.

*Brown* also does not disclose a system to "create the enterprise voice directory based on the encrypted XML-based files, the enterprise voice directory configured for run-time access by

the voice activated auto-attendant service provider network”, as recited in claim 1. In contrast to claim 1, *Brown* discloses a “speech synthesizer [which] generates speech which characterizes the structure and content of a web page retrieved over the network.” *Brown*, Abstract (emphasis added). “The HTML parser 112, voice processor 114 and TTS synthesizer 116 transform the text and other web page information into speech which is delivered to the audio interface device 108 via the network 109”. *Brown*, col. 3, ll. 56-60 (emphasis added). Using a speech synthesizer to generate speech that characterizes the structure and content of a web page retrieved over a network does not teach or suggest creating an enterprise voice directory accessible by a voice-activated auto-attendant.

In addition, *Crockett* and *Brown*, individually or in combination, do not teach or suggest other elements of claim 1. For example, neither *Crockett* nor *Brown*, individually or in combination, teach or suggest to “convert the received data from an enterprise data format to eXtended Markup Language (XML)-based files”, as recited in claim 1. Similarly, neither *Crockett* nor *Brown*, individually or in combination, teach or suggest the element of “encrypt the XML-based files using an encryption key issued by the voice activated auto-attendant service provider network to form encrypted XML-based files” as recited in claim 1. Additionally, neither *Crockett* nor *Brown*, individually or in combination, teach or suggest the element of “store the encrypted XML-based files in a manner that is accessible to the voice activated auto-attendant service provider network” as recited in claim 1.

Therefore, neither *Crockett* nor *Brown*, individually or in combination, teach or suggest every element of claim 1. The Office has thus failed to provide a *prima facie* case of obviousness for claim 1. Accordingly, claim 1 is allowable.

Claims 2-9, 11-13, and 31-34, depend from claim 1 and are therefore also allowable. In addition, claims 2-9, 11-13, and 31-34, disclose additional elements not found in the references. For example, none of the cited references teach or suggest “[t]he system of claim 1, wherein a second data connector is coupled to the remote enterprise information system and wherein the second data connector is selected based on the type of data in an enterprise information data source that is included in the remote enterprise information system, wherein the second data

connector is used to convert data to a format compatible with the voice activated auto attendant service provider network", as recited in claim 31. Thus, claims 2-9, 11-13, and 31-34 are allowable.

#### **Claims 35-36 are Allowable**

The Office has rejected claim 35, at paragraph 4 of the Office Action, under 35 U.S.C. § 103(a), as being unpatentable over U.S. Application No. 2004/0141596 ("*Crockett*"), and further in view of U.S. Patent No. 6,587,822 ("*Brown*"). Applicant(s) respectfully traverse the rejections.

None of the cited references, including *Crockett* and *Brown*, disclose or suggest the specific combination of claim 35. For example, *Crockett* does not disclose "an enterprise voice service platform to store the dynamically constructed grammars from a first remote enterprise information system in a first directory and from a second remote enterprise system in a second directory, the enterprise voice service platform to provide a first voice service to a first set of incoming calls based on the first directory and a second voice service to a second set of incoming calls based on the second directory", as recited in claim 35. In contrast to claim 1, the cited portions of *Crockett* disclose a voice response system for a subscriber to enable and disable AIN features. "For example, the VXML platform 40 may play the following menu: "Please say 'one' to turn your call forwarding ON; 'two' to activate your weekly schedule; 'three' to activate your priority screening list; or 'four' to amend your call forwarding options". *Crockett* paragraph 0150. Enabling and disabling AIN features using a voice response system does not teach or suggest an enterprise voice service platform to store the dynamically constructed grammars from a first remote enterprise information system in a first directory and from a second remote enterprise system in a second directory, the enterprise voice service platform to provide a first voice service to a first set of incoming calls based on the first directory and a second voice service to a second set of incoming calls based on the second directory.

*Brown* similarly does not disclose "an enterprise voice service platform to store the dynamically constructed grammars from a first remote enterprise information system in a first directory and from a second remote enterprise system in a second directory, the enterprise voice

service platform to provide a first voice service to a first set of incoming calls based on the first directory and a second voice service to a second set of incoming calls based on the second directory”, as recited in claim 35. In contrast to claim 35, *Brown* discloses a “speech synthesizer generates speech which characterizes the structure and content of a web page retrieved over the network.” *Brown*, Abstract (emphasis added). “The HTML parser 112, voice processor 114 and TTS synthesizer 116 transform the text and other web page information into speech which is delivered to the audio interface device 108 via the network 109”. *Brown*, col. 3, ll. 56-60 (emphasis added). Transforming text and other web page information into speech does not teach or suggest an enterprise voice service platform to store the dynamically constructed grammars from a first remote enterprise information system in a first directory and from a second remote enterprise system in a second directory, the enterprise voice service platform to provide a first voice service to a first set of incoming calls based on the first directory and a second voice service to a second set of incoming calls based on the second directory.

Neither *Crockett* nor *Brown* discloses an enterprise voice service platform that provides hosted auto-attendant voice services for multiple enterprises. For example, neither *Crockett* nor *Brown* disclose “an enterprise voice service platform to store the dynamically constructed grammars from a first remote enterprise information system in a first directory and from a second remote enterprise system in a second directory”, as recited in claim 35. Similarly, neither *Crockett* nor *Brown* discloses “the enterprise voice service platform to provide a first voice service to a first set of incoming calls based on the first directory and a second voice service to a second set of incoming calls based on the second directory”, as recited in claim 35.

Therefore, *Crockett* and *Brown*, individually or in combination, do not teach or suggest every element of claim 35. The Office has thus failed to provide a *prima facie* case of obviousness for claim 35. Accordingly, claim 35 is allowable. Claim 36 depends from claim 35 and is therefore also allowable. In addition, claim 36 discloses additional elements not found in the references. For example, claim 36 recites “[t]he system of claim 35, wherein the data connector is adapted to receive updated data from the remote enterprise information systems and to dynamically update the dynamically constructed grammars based on the received updated data”.

**Claim 37 is Allowable**

The Office has rejected claim 37, at paragraph 4 of the Office Action, under 35 U.S.C. § 103(a), as being unpatentable over U.S. Patent Application No. 2004/0141596 ("*Crockett*"), and further in view of U.S. Patent No. 6,587,822 ("*Brown*"). Applicant(s) respectfully traverse the rejections.

None of the cited references, including *Crockett* and *Brown*, disclose or suggest the specific combination of claim 37. For example, *Crockett* does not disclose "a data processor to construct grammars from the received data in the common data format to produce an enterprise voice directory related to each of the one or more remote enterprise information systems, each entry in the enterprise voice directory containing at least one link to another entry in the enterprise voice directory", as recited in claim 37. In contrast to claim 37, the cited portions of *Crockett* disclose a voice response system for a subscriber to enable and disable AIN features. "For example, the VXML platform 40 may play the following menu: "Please say 'one' to turn your call forwarding ON; 'two' to activate your weekly schedule; 'three' to activate your priority screening list; or 'four' to amend your call forwarding options". *Crockett* paragraph 0150. Enabling and disabling AIN features using a voice response system does not teach or suggest a data processor to construct grammars from the received data in the common data format to produce an enterprise voice directory related to each of the one or more remote enterprise information systems, each entry in the enterprise voice directory containing at least one link to another entry in the enterprise voice directory.

*Brown* also does not disclose "a data processor to construct grammars from the received data in the common data format to produce an enterprise voice directory related to each of the one or more remote enterprise information systems, each entry in the enterprise voice directory containing at least one link to another entry in the enterprise voice directory", as recited in claim 37. In contrast to claim 37, *Brown* discloses a "speech synthesizer generates speech which characterizes the structure and content of a web page retrieved over the network." *Brown*, Abstract (emphasis added). "The HTML parser 112, voice processor 114 and TTS synthesizer 116 transform the text and other web page information into speech which is delivered to the

audio interface device 108 via the network 109". *Brown*, col. 3, ll. 56-60 (emphasis added). Transforming text and other web page information into speech does not teach or suggest a data processor to construct grammars from the received data in the common data format to produce an enterprise voice directory related to each of the one or more remote enterprise information systems, each entry in the enterprise voice directory containing at least one link to another entry in the enterprise voice directory.

Therefore, *Crockett* and *Brown*, individually or in combination, do not teach or suggest every element of claim 37. The Office has thus failed to provide a *prima facie* case of obviousness for claim 37. Accordingly, claim 37 is allowable.

## CONCLUSION

Applicants have pointed out specific features of the claims not disclosed, suggested, or rendered obvious by the references applied in the Office Action. Accordingly, Applicant respectfully requests reconsideration and withdrawal of each of the objections and rejections, as well as an indication of the allowability of each of the pending claims.

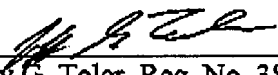
Any changes to the claims in this amendment, which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Examiner is invited to contact the undersigned attorney at the telephone number listed below if such a call would in any way facilitate allowance of this application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

Respectfully submitted,

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Date

  
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